

**Amendments to the Drawings**

The attached sheets of drawings include changes to Figs. 1 and 14. These sheets, which include Fig. 1 and 14, replace the original sheets including Figs. 1 and 14.

Attachment: (2) Replacement Sheets

### Remarks

Favorable reconsideration of this application, in view of the above amendments and in light of the following remarks and discussion, is respectfully requested.

Claims 1-9 and 17-30 are currently pending in the application; Claims 1, 3, 4, and 9 having been amended, non-elected Claims 10-16 having been canceled without prejudice or disclaimer, and new Claims 17-30 having been added, by way of the present response.

In the Office Action the drawings were objected to; the use of a trademark was noted in the application; a new title was required; Claim 9 was objected to because of an informality; Claims 1, 8, and 9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2002/0141771 to Nishimura in view of U.S. Patent No. 6,697,599 to Scherdel and Japanese Publication No. 58-126566 to Tsukahara; and Claims 2 and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Nishimura in view of Scherdel and Tsukahara, and further in view of U.S. Patent No. 6,799,012 to Shakuto et al.

Initially, Applicants express thanks for the Examiner's indication that Claims 3-6 recite allowable subject matter, such that the claims although having been objected to would be allowable when rewritten in independent form. In response, Applicants have so-rewritten Claim 3. Applicants respectfully assert that Claims 4-6 depend from newly independent Claim 3. Thus, in accordance with the Examiner's indication of allowable subject matter, Applicants respectfully request the allowance of Claims 3-6.

As stated above the drawings were objected to under 37 C.F.R. 1.84(p)(5) because they include a reference character not mentioned in the description. In response, as shown in the attached replacement sheets, Applicants have amended Figure 1 so as to remove reference character 32.

The drawings were also objected to because in Figure 14  $t_1$  was requested to be changed to  $T_1$ . In response, as also shown in the attached replacement sheets, Applicants

have so-amended Figure 14. Thus, Applicants respectfully request that the objections to the drawings be withdrawn.

As stated above the use of a trademark was noted in the application. Applicants have capitalized the trademark "MYLAR" in the specification, and have included generic terminology.

As stated above a new title was required indicative of an invention to which claims are directed. In response, Applicants have amended the title to state "IMAGE FORMING APPARATUS AND PROCESS CARTRIDGE INCLUDING FLEXIBLE MEMBER."

As stated above Claim 9 was objected to because of an informality. In response, Applicants have amended Claim 9 to recite "least" in place of the previous recitation of "last," in accordance with the Examiner's helpful suggestion. Thus, Applicants respectfully request that the objection to Claim 9 be withdrawn.

As stated above Claims 1, 8, and 9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Nishimura in view of Scherdel and Tsukahara. Claims 2 and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Nishimura in view of Scherdel and Tsukahara, and further in view of Shakuto. Applicants respectfully assert that the amendments to the claims have overcome the rejections for the following reasons.

The present invention is directed to an image forming apparatus (e.g., as recited in independent Claim 1) as well as a process cartridge removably mounted to a body of an image forming apparatus (e.g., as recited in independent Claim 9). Independent Claims 1 and 9 recite cleaning means using a bladeless system for removing a residual toner left on an image carrier after image transfer without scraping off the residual toner with a blade member. A flexible member is disposed upstream of the cleaning means and is affixed at one edge portion and has a flat surface formed with a plurality of grooves at the other edge portion. The plurality of grooves each extend over an image forming range of a surface of

the image carrier perpendicularly to a direction in which the surface of the image carrier is movable. The flexible member is positioned such that the flat surface contacts the surface of the image carrier with the flexible member being deformed.

Regarding the rejection of independent Claims 1 and 9, Nishimura is directed to an image forming apparatus. Applicants respectfully assert that Nishimura does not teach or suggest, and the Office Action explicitly concedes that Nishimura does not teach or suggest, the claimed features of a flexible member. Therefore, Applicants respectfully assert that Nishimura also does not teach or suggest the claimed features of a flexible member disposed upstream of a cleaning means using a bladeless system, as recited in the independent claims.

Specifically, independent Claims 1 and 9 recite “a flexible member disposed upstream of the cleaning means.”

The Office Action asserts that Scherdel and Tsukahara remedy the deficiencies of Nishimura. Applicants respectfully assert that neither Scherdel nor Tsukahara remedies these deficiencies, however, for the following reasons.

Scherdel is directed to a device for removing a coating adhering to an intermediate carrier. As shown in the figures of Scherdel, a brush cleaning device 11 is arranged in front of (i.e., upstream of) a blade/cleaning unit 15, so as to reduce a residual toner on an intermediate carrier 1 such that too much toner is not conveyed under the blade.<sup>1</sup>

Applicants respectfully assert that Scherdel does not teach or suggest, however, the claimed features of a flexible member disposed upstream of a cleaning means using a bladeless system, as recited in the independent claims. Specifically, Applicants respectfully assert that Scherdel does not show or state the blade/cleaning unit 15 disposed upstream of the brush cleaning device 11, for example.

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<sup>1</sup> From Column 3, line 62 to Column 4, line 3.

Tsukahara is directed to a cleaning blade in an electrophotographic copying machine. Applicants respectfully assert, however, that as Tsukahara does not teach or suggest the claimed features of both a flexible member and a cleaning means using a bladeless system, Tsukahara also does not teach or suggest the claimed features of a flexible member disposed upstream of a cleaning means using a bladeless system, as recited in independent Claim 1 and 9.

Thus, for the above reasons, Applicants respectfully assert that none of Nishimura, Scherdel, and Tsukahara, whether taken alone or in combination, teach or suggest the claimed features recited in independent Claims 1 and 9. Therefore, Applicants respectfully request that the rejection of independent Claims 1 and 9 under 35 U.S.C. § 103(a) be withdrawn, and respectfully request the allowance of independent Claims 1 and 9.

Applicants respectfully assert that Claims 2, 7, and 8 are allowable for the same reasons as independent Claim 1 from which they depend, as well as for their own features. Thus, Applicants respectfully request that the rejections of dependent Claims 2, 7, and 8 under 35 U.S.C. § 103(a) be withdrawn, and respectfully request the allowance of dependent Claims 2, 7, and 8.

Applicants respectfully assert that new independent Claim 17, as well as Claims 18-20 depending therefrom, recites novel and unobvious features including a flexible member having a grooved surface configured to contact a surface of an image carrier with a pressure from 0.1 N to 0.8 N. Thus, Applicants respectfully request the allowance of new Claims 17-20.

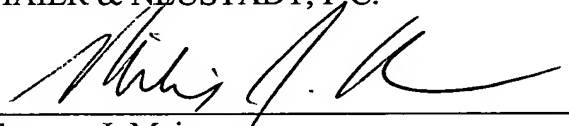
Applicants further respectfully assert that new independent Claims 21 and 26, as well as Claims 22-25 and 27-30 depending therefrom, are allowable for reasons similar to those of independent Claims 1 and 9, as discussed above. Thus, Applicants respectfully request the allowance of new independent Claims 21-30.

Consequently, in view of the present amendment, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal Allowance. A Notice of Allowance for Claims 1-9 and 17-30 is earnestly solicited.

Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact the undersigned representative at the below listed telephone number.

Respectfully submitted,

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